REMARKS

Upon entry of this amendment, claims 1-18 are all the claims pending in the application.

By this Amendment, Applicant editorially amends claims 1-17 to delete all references to items.

The amendments to claims 1-17 were made for reasons of conforming the claims to the US

practice, and do not narrow the literal scope of the claims and thus do not implicate an estoppel

in the application of the doctrine of equivalents. The amendments to claims 1-17 were not made

for reasons of patentability.

In addition, in order to provide more varied protection, claim 18 is herein added.

Preliminary Remarks

Applicant thanks the Examiner for acknowledging the claim to foreign priority and for

confirming that the certified copy of the priority document was received. Applicant also thanks

the Examiner for initialing the references listed on forms PTO-1449 submitted with the

Information Disclosure Statements filed on October 6, 2000 and February 7, 2001.

Objections to the Claims

The Examiner objected to claims 1, 4-6, 10-11 and 17 because of minor informalities.

Applicant has revised the claims, and respectfully submits that the claims as now presented no

longer include the potential informalities mentioned by the Examiner. Applicant therefore

respectfully requests the Examiner to withdraw the objections to claims 1, 4-6, 10-11 and 17.

Claim Rejections under 35 U.S.C. § 103(a)

Claims 1-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over De Zen

et al. "Value-Added Internet: a Pragmatic TINA-Based Path to the Internet and PSTN

Integration" Global Convergence of Telecommunications and Distributed Ogjected Computing

Proceedings, November 17-20, 1997 (hereinafter "Zen") in view of Manione et al., "A :TINA

Light: Service Architecture for the Internet-Telecom scenario", Telecommunications Information

Networking Architecture Conference Proceedings, April 12-15, 1999 (hereinafter "Manione").

Applicant respectfully traverses this rejection and respectfully requests the Examiner to

reconsider this rejection in view of the comments, which follow.

Of these claims, only claims 1, 11 and 17 are independent. Independent claims 1, 11 and

17 recite a number of unique features not taught by the prior art. For example, independent

claim 1 recites: *installing a servlet at a web-server of a content provider having access to said*

service platform and *detecting by said servlet whether or not said certain browser session is*

already associated to a related service session. The Examiner asserts that claim 1 is directed to

a method for accessing a service platform via an Internet browser session and is obvious in view

of Zen and Manione.

In particular, the Examiner alleges that Zen implies the use of a servlet and that Manione

teaches using servlets to interact with the user browser for session services such as event logging

and session managing (see pages 4-5 of the Office Action). Applicant respectfully disagrees

with the Examiner. Applicant have carefully studied Zen's discussion of CORBA and Java on

the server side and Manione's discussion of servlets, which are not similar to the servlets, as set forth in claim 1.

Zen teaches a theoretical concept of integrating the Internet with a PSTN using TINA (see *Abstract*). In particular, Zen teaches an end user, a retailer and a third party service provider. The retailer is SISTINA, which in addition to TINA is functionality provides additional benefits of session control, guaranteed quality of service, etc. (Fig. 1; § 2.0). In particular, Zen teaches the end user must download additional Java software in order to make his browser TINA capable. This software that must be downloaded incorporate Java CORBA client for functional interaction (§ 2.1). Zen's retailer provides features like access session capabilities and communication session capabilities. In addition, the retailer serves as a connectivity provider providing access to the resources of the physical switched network (§ 2.2). Finally, Zen teaches an Internet Application Provider, which interacts with the retailer using CORBA (§2.3).

The Examiner alleges that Zen teaching of using Java and CORBA technology on the Web server side in an effort for the support of the interaction between the Web server and web browser via SISTINA retailer "implies that there is a use of servlet as a Java program running on the Web server" (see page 4 of the Office Action). Applicant respectfully submits that this implication is incorrect as a technical matter.

For example, Java has an interface defined in an Interface Definition Language (IDL) with the interface being resolved at run time (wrapped code). Therefore, Zen could be using a Java implemented wrapper process and not a servlet. This wrapper process often communicates

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using a socket to connect with an applet. In short, in Zen, there is no suggestion either explicit or implicit to use servlets.

Zen further teaches using CORBA, which is a distributed object broker architecture that requires establishment of interorb links (using inter-object request broker). CORBA tool uses an IDL file to create stubs and skeletons, which serve as proxies for clients and servers. Because IDL defines interfaces very strictly so that the stubs on the client side will not have a problem meshing perfectly with the skeleton on the server side. However, this causes problems for maintenance and development especially over the network boundaries. CORBA is impractical for portal for services because portals need to be reconfigurable. In short, similarly to Zen's Java, CORBA fails to imply a servlet, as set forth in claim 1.

In addition, Manione fails to cure the deficient teachings of Zen. Manione teaches integrating traditional telecommunications and the Internet using a simplified TINA. In particular, Manione teaches combining the provider and a retailer to simplify the structure of TINA (see *Abstract*). Moreover, Manione teaches using one single Java native ORB through the entire platform. In particular, Manione teaches using active UAP and static UAP in the user domain (§ 2.B, pages 25-26).

Active UAPs are regular computational objects (no different from conventional ones). The active UAP is implemented through a Java applet because the invocation of the methods through its interface must be signed. Static UAP may be a set of HTML pages, with optional JavaScript extensions. The first page is downloaded and user actions trigger the download of the

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next page. UAP Backend procedures (e.g. servlet or CGI) support such mechanism (§ 3.A, pages 26-27).

In short, Manione teaches Java applets via ORB for active UAP and downloaded web pages via servlets for static UAP. However, Manione only teaches <u>using the servlet to download web pages</u> to the user. Manione clearly fails to teach or suggest any detection of a related service session by the servlet. Moreover, Manione teaches providing an applet using ORB as opposed to the servlet.

For at least these exemplary reasons, therefore, Applicant respectfully submits that an artisan of ordinary skill would not have (and could not have) produced the subject matter of independent claim 1 from the teachings of Zen and Manione, taken alone or in any conceivable combination. Applicant therefore respectfully requests the Examiner to reconsider, and to withdraw this rejection of independent claim 1. Also, Applicant respectfully submits that claims 2-10 are allowable by virtue of their dependency on claim 1.

With respect to independent claim 11, among many unique features, it recites *a servlet detecting whether or not said certain browser session is already associated to a related service session of a service platform*. This limitation is similar to the limitation of a servlet detecting whether or not the certain web browser session is already associated to said related service session, as set forth in claim 1. Since claim 11 contains features that are similar to the features argued above with respect to claim 1, those arguments are respectfully submitted to apply with equal force here. For at least the same exemplary reasons, therefore, Applicant respectfully

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requests the Examiner to withdraw this rejection of independent claim 11 and its dependent

claims 12-16.

With respect to independent claim 17, among many unique features, it recites:

informing a servlet launched on a web server of a content provider via the service session about

the association of said browser session to said service session. This limitation is similar to the

limitation of a servlet detecting whether or not the certain web browser session is already

associated to said related service session, as set forth in claim 1. Since claim 17 contains

features that are similar to the features argued above with respect to claim 1, those arguments are

respectfully submitted to apply with equal force here. For at least the same exemplary reasons,

therefore, Applicant respectfully requests the Examiner to withdraw this rejection of independent

claim 17.

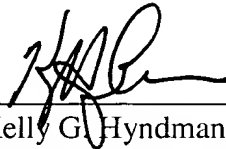Conclusion and request for a telephone interview

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly invited to contact the undersigned attorney at the telephone number listed below.

Amendment Under 37 C.F.R. § 1.111
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Attorney Docket No.: Q60971

Applicant hereby petitions for any extension of time which may be required to maintain

the pendency of this case, and any required fee, except for the Issue Fee, for such extension is to

be charged to Deposit Account No. 19-4880.

Respectfully submitted,

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WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: April 15, 2004

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